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ADMITTED IN N.Y. AND N.J.

MEMO ENDORSED

November 10, 2016

VIA ECF

The Honorable Richard M. Berman
United States District Judge
Daniel Patrick Moynihan Courthouse
500 Pearl Street, Courtroom 12D
New York, NY 10007

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 11/10/16

Re: United States v. Reza Zarrab, et al.
S1 15 Cr. 867 (RMB)

Dear Judge Berman:

We represent Reza Zarrab in the above-captioned matter. We, jointly with the Government, propose the following schedule:

Government Response to defense Motion to Suppress Emails (docket 112) on or before November 14, 2016.

Defense Reply on or before November ¹⁷~~21~~, 2016 at 12:00 noon. RMB

Subject to ruling that a hearing is unnecessary, direct testimony of each witness shall be presented via affidavit not to exceed 10 pp per witness double spaced, and filed with the Court on or before November ²⁴~~29~~, 2016 at 12:00 noon (along with a list and brief bio of each witness) RMB

Hearings will be held on the Motion to Suppress Reza Zarrab's iPhone and Certain Statements (docket 64) and/or the Motion to Suppress Emails (docket 112) on November 30, 2016 at ~~10:00 a.m.~~ ^{9:15 a.m.} RMB

Amended Schedule

SO ORDERED:

RMB
RICHARD M. BERMAN U.S.D.J.
11/14/16

Respectfully submitted,

Benjamin Brafman

Benjamin Brafman
Joshua D. Kirshner

cc: All counsel of record (by ECF)